

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re: New York City Policing During Summer

Index No. 20-CV-8924(CM)(GWG)

2020 Demonstrations

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DECLARATION OF COREY STOUGHTON IN SUPPORT
OF PLAINTIFFS' MOTION TO COMPEL

COREY STOUGHTON, a member of the Bar of New York and a member of the bar of this Court, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am an attorney at The Legal Aid Society (LAS) and serve as counsel for the *Payne* plaintiffs in this consolidated action. As such, I am fully familiar with the facts and circumstances of this proceeding.

2. I submit this declaration in support of the plaintiffs' motion to compel. Attached to this declaration are documents referenced in plaintiffs' memorandum of law in support of the motion to compel.

3. Attached as Exhibit 1 to this declaration is a true and correct copy of the Affirmation of Thomas Conforti, dated April 19, 2022.

4. Attached as Exhibit 2 to this declaration is a true and correct copy of the June 24 Conforti Privilege Log.

5. Attached as Exhibit 3 to this declaration is a true and correct copy of the April 19 Conforti Privilege Log.

6. Attached as Exhibit 4 to this declaration is a true and correct copy of the email exchange between Plaintiffs and Defendants.

7. Attached as Exhibit 5 to this declaration is a true and correct copy of the Conforti Privilege Log Supplement, dated May 17, 2022.

8. Attached as Exhibit 6 to this declaration is a true and correct copy of the Second Affirmation of Thomas Conforti, dated June 29, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 21, 2022
New York, N.Y.

/s/ Corey Stoughton
Corey Stoughton
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